

I am an American independent recording artist currently residing in Germany, and am also the German correspondent for The Hollywood Reporter.

I've released four albums in Germany and am currently looking for labels in the US and Germany to release my fifth. I've toured in Europe and the US, and have been on national television and radio in Germany.

The difference between my experiences with German and US radio are palpable. Even as an unsigned artist I have done live shows and interviews on German radio as well as had my music played in connection with upcoming concerts. During US tours, I have gotten occasional radio airplay if the venue I was playing at had a good relationship with a local radio programmer. Without those relationships, I would have had no airplay in this country whatsoever.

My experience, in both countries, has been that local airplay helps motivate people to come to concerts. There is no other medium that is as effective, because people listen to the radio to hear music and that's what they'll do when they come to the concert. It's a one-to-one correspondence. Without local radio, not only would I as a musician have very little chance of reaching out to potential fans who have never heard of me (barring an extremely poetic preview in the local paper), but music-lovers would lose a valuable resource for new discoveries.

I think it's absolutely vital that as many radio programming decisions as possible be made at the local level. Of course, the superstars funded by the majors will still have the high ground, but at least the playing field will be a bit closer to level. Many local artists are every bit as good as (if not better than) the stars, and would have as big a local following if they had entree into the same media. Radio stations would still band together on their playlists at least some of the time for convenience's sake, but there would be a bit of breathing room in the playlists if the FCC insisted that the stations serve their local communities.

Local programming should be defined as broadly as possible, and should definitely include some outlet for local music. And I don't mean that the Asbury Park radio station should play an hour of Bruce Springsteen a day - local music means music that is NOT national.

And local programming is local PROGRAMMING, not activities. Sponsoring a local walk-a-thon, for instance, is marketing - not programming.

The spirit and letter of the FCC payola rules should be guided by the precept that radio programmers are paid to play the music they think is good. The basic qualification for a radio programmer is to have musical taste that runs along the same lines as that of the station's core demographic, and any attempt to influence with money or gifts the decisions based on that personal taste is a form of payola. Period.

And yes, the station DOES have an obligation to inform the public of who played the tune they just heard. The public owns the airwaves, and it is their right to have their curiosity satisfied. Radio should earn money by selling advertising - period - NOT by selling information.

Voice-tracking is an abuse of the public trust unless it is clear to the listener that he/she is not hearing a local broadcast. The best way for the FCC to deal with this is to have a large "local programming" requirement that cannot be fulfilled by voice-tracked programming.

Obviously, national playlists defeat localism utterly. On tour throughout the US, I hear the same music in Arizona as I did in New Jersey - even on "golden oldies" stations. I am convinced that the advent of national playlists has contributed materially to the misfortunes of the US recording industry, perhaps even more so than illegal downloading. When you hear the same pap everywhere you go, eventually you stop wanting to spend your hard-earned cash on the latest pap CD.

I don't think it's practical to make a rule that all programming decisions be made at the local level - I can't imagine how a rule like that would be enforced. But if every station had to devote at least 50% of its prime airtime to local content, and if those stations exceeding the minimum received various kinds of considerations (financial or otherwise) when it came time to renew their licenses, this would go a long way towards restoring a healthy radio landscape in the US.

LPFM stations in major cities could certainly benefit the music community. Music performed at the cafe or house concert level would be a natural feature of the programming of such stations, informing and thereby drawing bigger crowds to these venues.

Thank you for giving me an opportunity to express my thoughts on these issues.